## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS DIVISION

# FILED

APR 1 2 2022 UNITED STATES OF AMERICA, U.S. DISTRICT COURT INDIANAPOLIS, INDIANA Plaintiff, Cause No. 1:22-cr-0058 JRS v. EDEER AVILA -01 a/k/a Edeer Issel Avila-Moradel, MARTIN FELIX-GARCIA a/k/a Luis Miguel Felix-Garcia a/k/a Flaco, -02 ISAIAS GONZALEZ-TORRES, -03 ERLIN LUCERO-ASENCIO a/k/a Alan Salazar a/k/a Guate a/k/a Guatemala, -04 ABEL AYALA-GARCIA -05 a/k/a Pollo, LUIS DANIEL HERNANDEZ a/k/a Daniel Luis Hernandez a/k/a Luis Daniel Hernandez Mencias -06 a/k/a DH Hernandez a/k/a Pijas, ANDREW CALIX-MALDONADO, -07 -08 JULIO VICENTE-GUOX, **EDUARDO RODRIGUEZ** -09 a/k/a Eduardo Rodriguez-Sabillon, KENIA ACOSTA a/k/a Kenia Chavez a/k/a Kenia Odalis -10 Acosta-Rivera. JEAMI WALESKA SEVILLA-LUNA -11 a/k/a Jeami Luna-Sevilla, VICTOR VAZQUEZ-HERNANDEZ, -12 ALLISON PERDUE, -13 JOHN WHIFFING, -14 ABNER RODAS-ABELARDEZ, -15 CLAUDIO GARCIA-MORALES, -16 -17 EULAILO MURILLO-RESURA, JENDRY MEDINA -18 a/k/a Julian Reyes,

Defendants.

### INDICTMENT

The Grand Jury charges that:

#### **COUNT ONE**

21 U.S.C. §§ 841(a)(1) and 846

Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances

Beginning at a date unknown to the grand jury, but no later than mid-2021, and continuing up to and including April 12, 2022, in the Southern District of Indiana and elsewhere, EDEER AVILA a/k/a Edeer Issel Avila-Moradel, ISAIAS GONZALEZ-TORRES, ERLIN LUCERO-ASENCIO a/k/a Alan Salazar a/ka Guate a/k/a Guatemala, ABEL AYALA-GARCIA a/k/a Pollo, LUIS DANIEL HERNANDEZ a/k/a Daniel Luis Hernandez a/k/a Luis Daniel Hernandez Mencias a/k/a DH Hernandez a/k/a Pijas, ANDREW CALIX-MALDONADO, JULIO VICENTE-GUOX, EDUARDO RODRIGUEZ a/k/a Eduardo Rodriguez-Sabillon, KENIA ACOSTA a/k/a Kenia Chavez a/k/a Kenia Odalis Acosta-Rivera, JEAMI WALESKA SEVILLA-LUNA a/k/a Jeami Luna-Sevilla, VICTOR VAZQUEZ-HERNANDEZ, ALLISON PERDUE, JOHN WHIFFING, ABNER RODAS-ABELARDEZ, CLAUDIO GARCIA-MORALES, EULAILO MURILLO-RESURA, defendants herein, did knowingly conspire together and with diverse other persons, known and unknown to the Grand Jury, to possess with intent to distribute and to distribute controlled substances, to include 500 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 846.

<u>COUNT TWO</u> 18 U.S.C. 1956(h)

Conspiracy to Launder Monetary Instruments

From on or about January 2020 through April 12, 2022, the exact dates being unknown to the Grand Jury, in the Southern District of Indiana and elsewhere, ISAIAS GONZALEZ-TORRES, ERLIN LUCERO-ASENCIO a/k/a Alan Salazar a/ka Guate a/k/a Guatemala, MARTIN FELIX-GARCIA a/k/a Luis Miguel Felix-Garcia a/k/a Flaco, EDEER AVILA a/k/a Edeer Issel Avila-Moradel, ABEL AYALA-

GARCIA a/k/a Pollo, LUIS DANIEL HERNANDEZ a/k/a Daniel Luis Hernandez a/k/a Luis Daniel Hernandez Mencias a/k/a DH Hernandez a/k/a Pijas, ANDREW CALIX-MALDONADO, EDUARDO RODRIGUEZ a/k/a Eduardo Rodriguez-Sabillon, and JENDRY MEDINA a/k/a Julian Reyes, defendants herein, did knowingly conspire together and with diverse other persons known and unknown to the Grand Jury to knowingly and intentionally conduct and attempt to conduct financial transactions, knowing that the property involved in the financial transactions represented, in whole or in part, the proceeds of a specified unlawful activity (that is, distribution of controlled substances), and knowing that the transactions were designed, in whole or in part, to conceal or disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity; in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and (h).

### **FORFEITURE**

- 1. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.
- 2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and 846, EDEER AVILA a/k/a Edeer Issel Avila-Moradel, ISAIAS GONZALEZ-TORRES, ERLIN LUCERO-ASENCIO a/k/a Alan Salazar a/ka Guate a/k/a Guatemala, ABEL AYALA-GARCIA a/k/a Pollo, LUIS DANIEL HERNANDEZ a/k/a Daniel Luis Hernandez a/k/a Luis Daniel Hernandez Mencias a/k/a DH Hernandez a/k/a Pijas, ANDREW CALIX-, JULIO VICENTE-GUOX, EDUARDO RODRIGUEZ a/k/a Eduardo Rodriguez-Sabillon, KENIA ACOSTA a/k/a Kenia Chavez a/k/a Kenia Odalis Acosta-Rivera, JEAMI WALESKA SEVILLA-LUNA a/k/a Jeami Luna-Sevilla, VICTOR VAZQUEZ-HERNANDEZ, ALLISON PERDUE, JOHN WHIFFING, ABNER RODAS-ABELARDEZ, CLAUDIO GARCIA-MORALES, EULAILO

MURILLO-RESURA, defendants herein, shall forfeit to the United States of America any property

constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses

and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the

commission of, the offenses.

3. The allegations contained in Count 2 of this Indictment are hereby realleged and

incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code,

Sections 982(a)(1).

4. Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense

in violation of Title 18, United States Code, Section 1956, ISAIAS GONZALEZ-TORRES, ERLIN

LUCERO-ASENCIO a/k/a Alan Salazar a/ka Guate a/k/a Guatemala, MARTIN FELIX-GARCIA a/k/a

Luis Miguel Felix-Garcia a/k/a Flaco, EDEER AVILA a/k/a Edeer Issel Avila-Moradel, ABEL AYALA-

GARCIA a/k/a Pollo, LUIS DANIEL HERNANDEZ a/k/a Daniel Luis Hernandez a/k/a Luis Daniel

Hernandez Mencias a/k/a DH Hernandez a/k/a Pijas, ANDREW CALIX-MALDONADO, EDUARDO

RODRIGUEZ a/k/a Eduardo Rodriguez-Sabillon, and JENDRY MEDINA a/k/a Julian Reyes, defendants

herein, shall forfeit to the United States of America any property, real or personal, involved in such

offense, and any property traceable to such property.

A TRUE BILL.

FORERERSON

ZACHARY A. MYERS United States Attorney

By:

Michelle P. Brady/

Assistant United States Attorney

4